

1 ELLIS GEORGE LLP
Dennis S. Ellis (State Bar No. 178196)
2 dellis@ellisgeorge.com
2121 Avenue of the Stars, 30th Floor
3 Los Angeles, California 90067
Telephone: (310) 274-7100
4 Facsimile: (310) 275-5697

5 *Interim Lead Class Counsel*

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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

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12 *In re Wells Fargo Mortgage Discrimination*
Litigation.

Case No. 3:22-cv-00990-JD

Honorable James Donato

13 **DECLARATION OF MICHAEL**
14 **WALLACE IN SUPPORT OF**
15 **PLAINTIFFS' MOTION FOR CLASS**
16 **CERTIFICATION**

Date: June 27, 2024

Time: 10:00 a.m.

Courtroom: 11

17
18 [Notice of Motion and Motion for Class
19 Certification; Memorandum of Points and
20 Authorities in Support of Plaintiffs' Motion for
21 Class Certification; Declarations of Dennis S.
22 Ellis with Supporting Evidence, Amanda
Kurzendoerfer, Leana Golubchik, Dante
Jackson, and [Proposed] Order filed
concurrently herewith]

DECLARATION OF MICHAEL WALLACE

I, MICHAEL WALLACE, declare and state as follows:

1. I am a founding member and officer of TM Financial Forensics, LLC (“TMF”) with over 37 years of experience in forensic accounting and the preparation and analysis of claims for economic damages in a wide variety of business disputes. TMF is a business, economics, financial and damages consulting company that provides services to business entities, individuals, and counsel. TMF was acquired by HKA Global LLC (“HKA”) in November 2022 and operates as a wholly owned subsidiary of HKA. I have been an HKA Partner since November 2022.

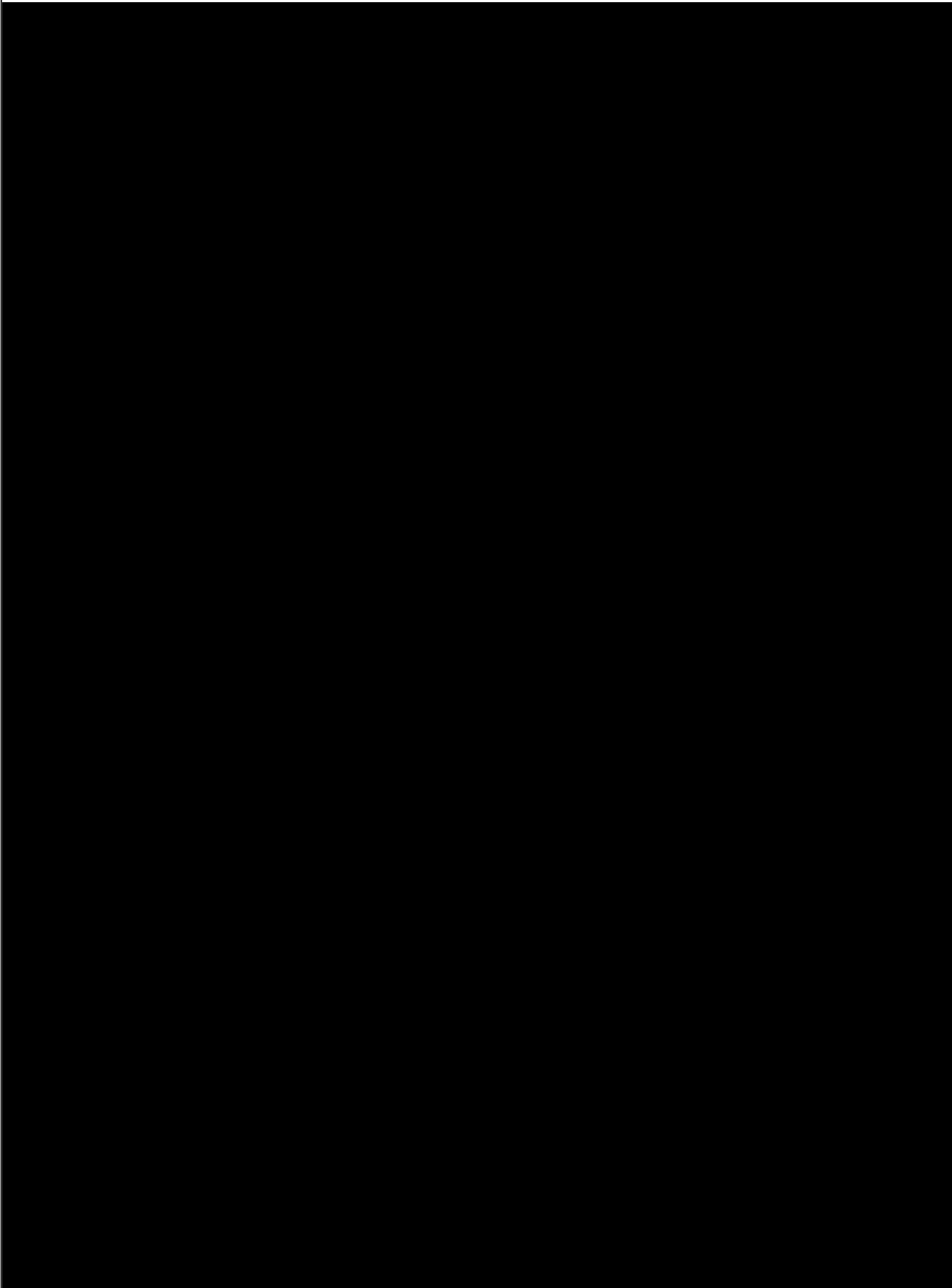
2. I have personal knowledge of the facts stated herein and, if called upon, could and would testify thereto. I submit this Declaration in support of Plaintiffs’ Motion for Class Certification.

Background

3. Attached as **Exhibit A** is a true and correct copy of the Expert Report of Michael Wallace that I submitted in this matter on February 29, 2024 (“Expert Report”).¹

¹ Exhibit A contains the narrative portion of my February 29, 2024 Expert Report, along with Attachments A (documents considered), B (resume) and C (testimony in last four years). Exhibit A does not include the Schedules attached to my Expert Report, which comprise 7,400 pages. The Schedules can be made available to the Court upon request.

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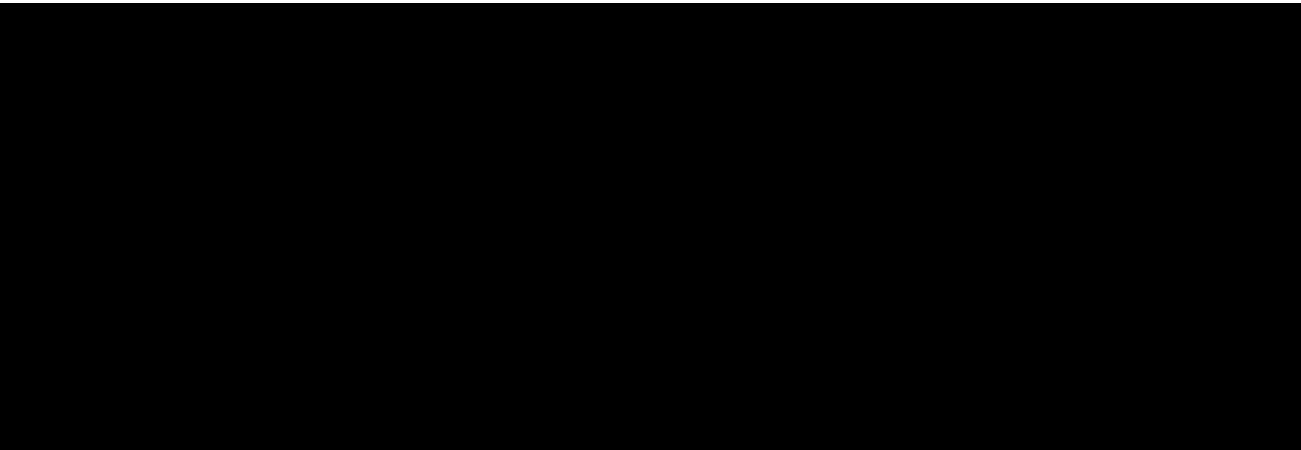


1 [REDACTED]
2 [REDACTED]
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10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 9. Attached as **Exhibit B** is a true and correct copy of the Expert Rebuttal Report of
14 Michael Wallace that I submitted in this matter on March 22, 2024 (“Rebuttal Report”).²
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

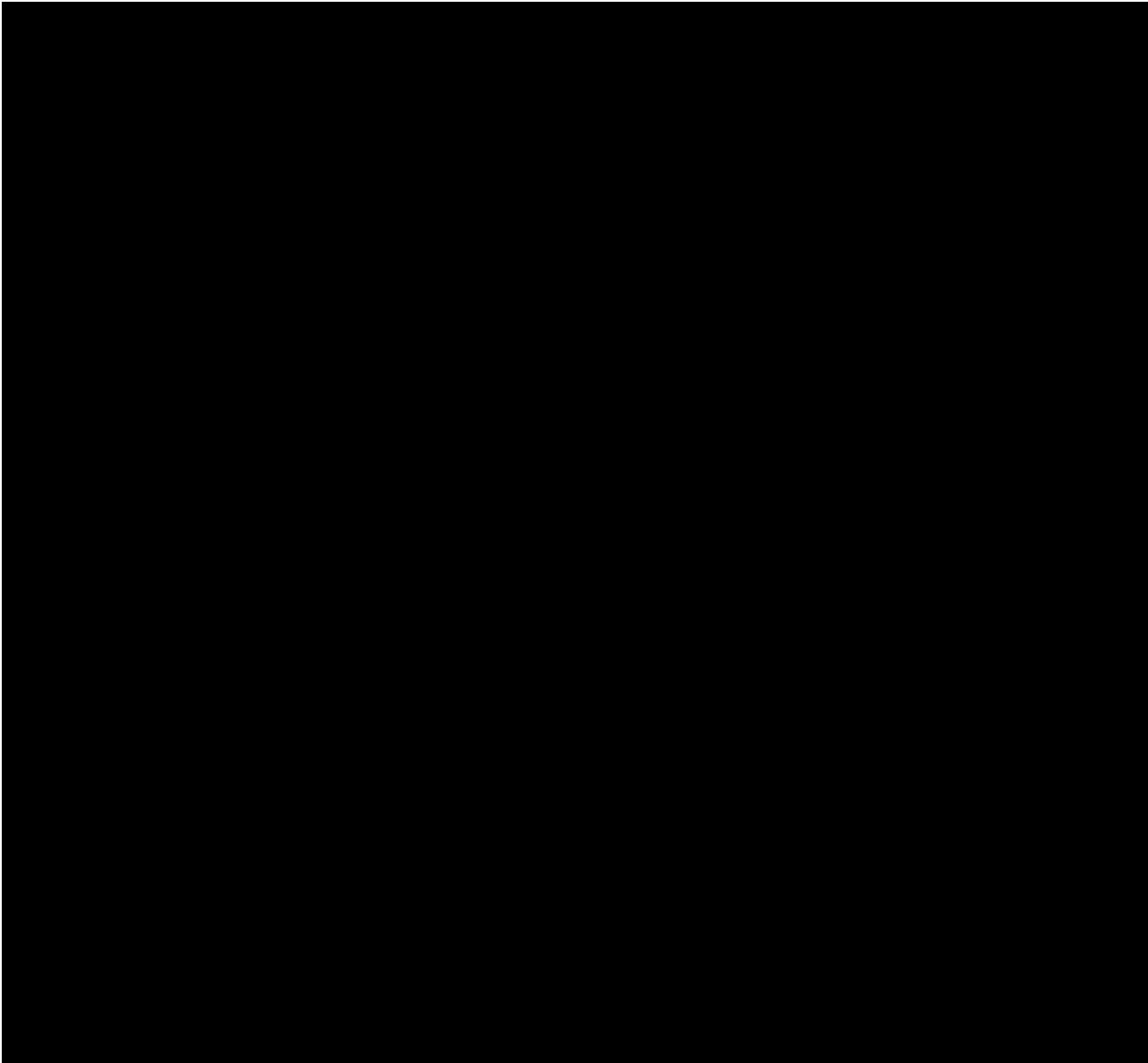
21 **Carlyn Irwin Report and Deposition**
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 _____
27 ² Exhibit B contains the narrative portion of my March 22, 2024 Rebuttal Report, along with Attachments A-R
28 (supplemental documents considered) and C-R (testimony in last four years). Exhibit B does not include the
Schedules attached to my Rebuttal Report, which comprise 1,122 pages. The Schedules can be made available to the
Court upon request.

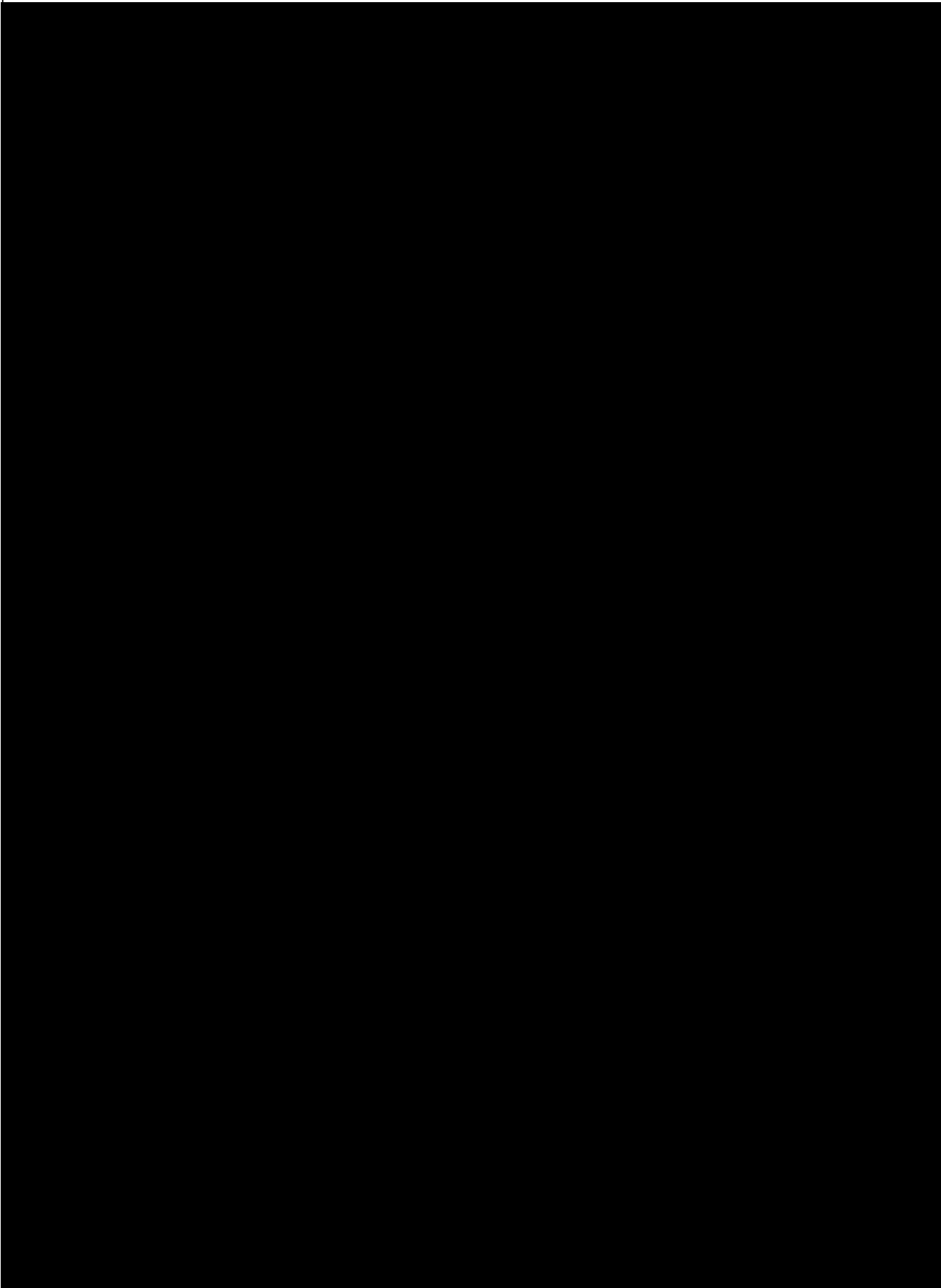
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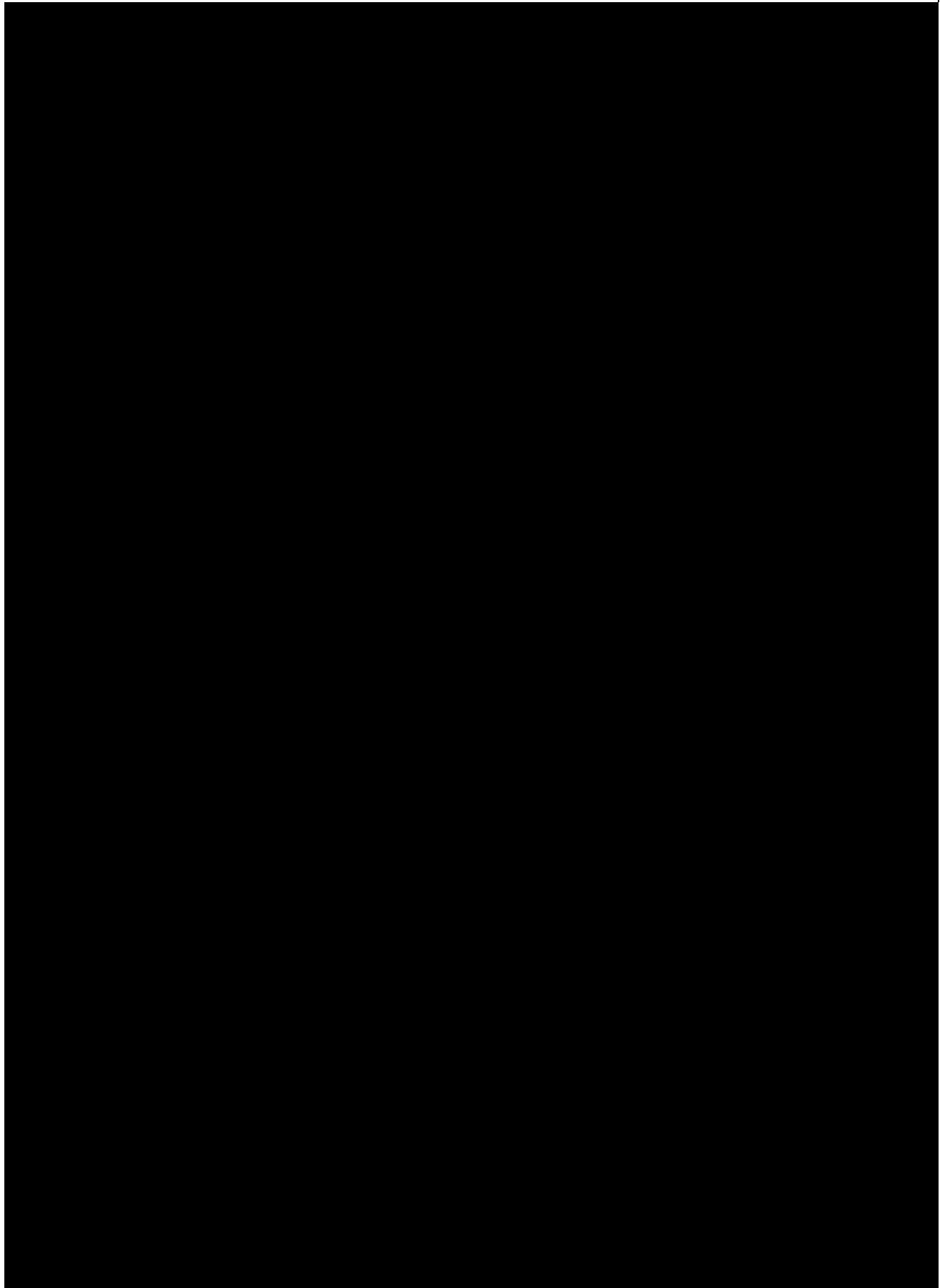
12. Attached as **Exhibit C** is a true and correct copy of excerpts of the deposition of Carlyn Irwin, dated April 5, 2024 (“Ex. C”).



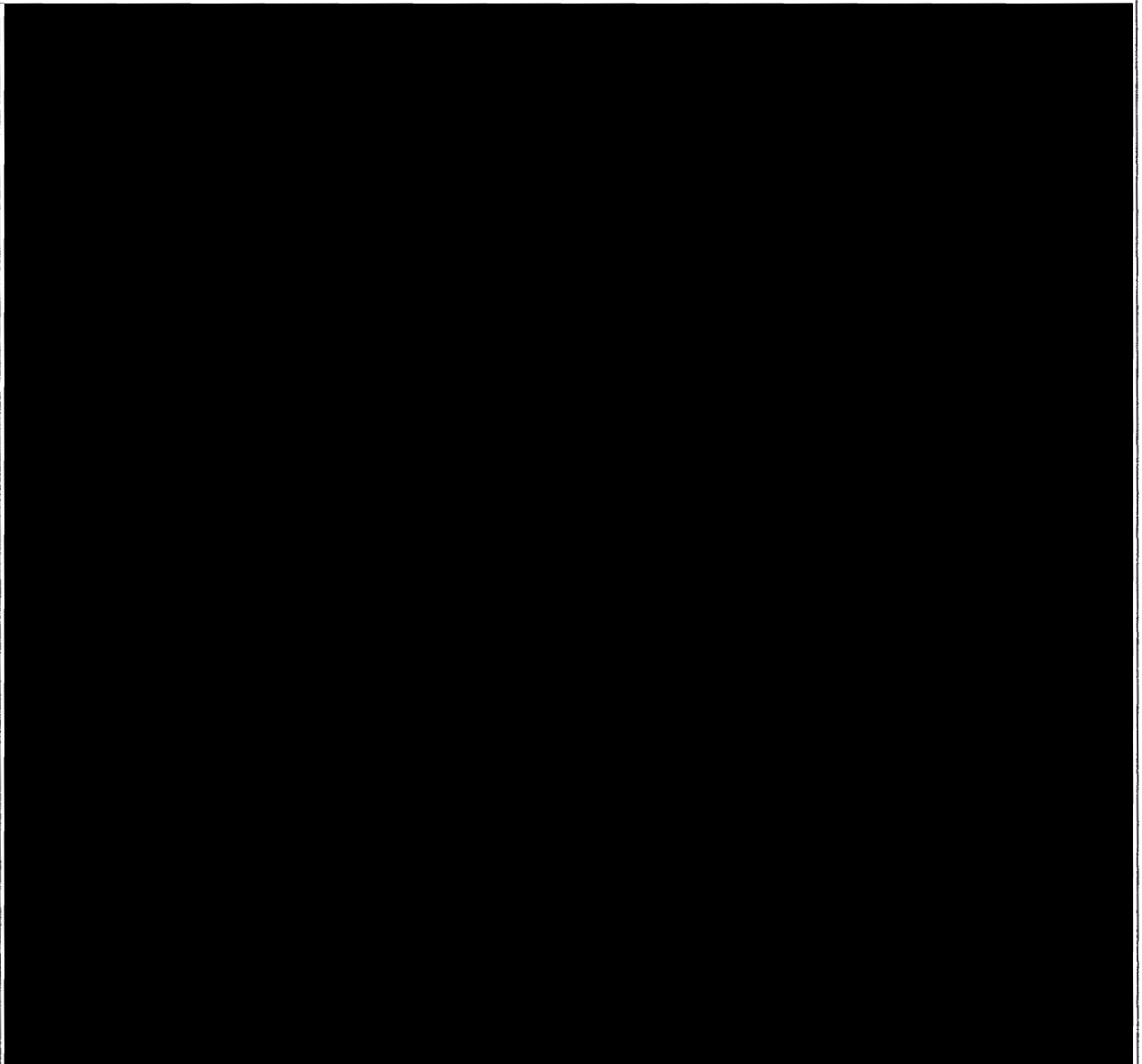
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on April 24, 2024, at Los Angeles, California.

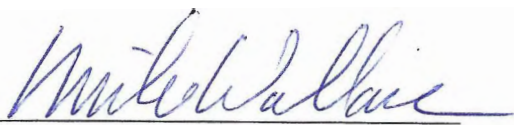

Michael Wallace

EXHIBIT A

**CONDITIONALLY FILED
UNDER SEAL**

EXHIBIT B

**CONDITIONALLY FILED
UNDER SEAL**

EXHIBIT C

**CONDITIONALLY FILED
UNDER SEAL**